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MEMO ENDORSED

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July 26, 2024

VIA ECF AND EMAIL

Honorable Judge Andrew L. Carter Jr.
United States District Court for the Southern District of New York

USDC SDNY
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Re: Coleman. et al. v. Optum, Inc., et al., No. 22 Civ. 05664 (ALC)
Staffing Agency Plaintiffs' Status Report and Request for Extension of Time

Dear Judge Carter:

We represent Plaintiffs Daniela Porcino and Nancy Shusterman ("Staffing Agency Plaintiffs"), who assert claims under the federal and New York Worker Adjustment and Retraining Notification Acts against Defendants Optum, Inc., and, respectively, Insight Global, LLC ("Insight") and Adecco USA, Inc. ("Adecco") (the latter two collectively referred to as the "Staffing Agencies"). (We also represent former Plaintiffs Rebecca Angulo and Terry Powell, who recently resolved and dismissed their claims against Defendant Optum, Inc., and, respectively, former Defendants Apex Systems, Inc ("Apex") and Equity Staffing Group, Inc. ("Equity").)

We are pleased to submit this status report, pursuant to the Court's order staying the Staffing Agency Plaintiffs' claims pending arbitration and requiring the parties to submit a status report after completion of arbitration or within six months of the Court's Order. (ECF 93 at 23). To facilitate these discussions, the Court extended the status report deadline to May 28, 2024 (ECF 105) and again to July 27, 2024 (ECF 116).

Plaintiffs have resolved and dismissed their claims against two of the original four Staffing Agency defendants: Apex and Equity (ECF 120 and 124). Of the two remaining Staffing Agency defendants, Plaintiffs have reached an agreement in principle with one (Adecco) and discussions are ongoing with the other (Insight). To finalize agreements and facilitate the ongoing discussions, the Staffing Agency Plaintiffs request a sixty-day extension of the status report deadline and intend to file a status report by **September 25, 2024**, at the latest.

The Staffing Agencies consent to the request.

[signature on following page]

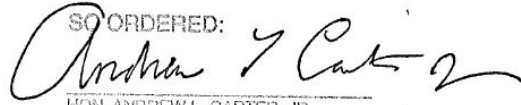
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Sincerely,

/s/ Jack A. Raisner

Jack A. Raisner

CC: Counsel of record (via ECF)

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

July 26, 2024
New York, NY